

**SKLAR LAW, LLC**

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*Attorneys for Andrew Sklar, Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

ORBIT ENERGY & POWER, LLC

Debtor.

Hon. Andrew B. Altenburg, Jr.

Case No. 22-19628 (ABA)

Chapter 7

Hearing Date: June 11, 2024

**NOTICE OF MOTION TO REOPEN CASE AND APPROVE  
SETTLEMENT AGREEMENT BETWEEN ANDREW SKLAR, AS  
CHAPTER 7 TRUSTEE OF ORBIT ENERGY & POWER, LLC AND  
SOLAR FOUNDATIONS USA, INC.**

TO: All Parties-in-Interest

**PLEASE TAKE NOTICE** that on June 11, 2024 at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Andrew Sklar, as Chapter 7 trustee (the "Trustee") for Orbit Energy & Power, LLC ("Debtor"), shall move before the Honorable Andrew B. Altenburg, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4B, for entry of an order (the "Order") reopening the case and approving the settlement agreement ("Settlement Agreement") by and between the Trustee and Solar Foundations USA, Inc., which is

attached as **Exhibit A** to the Certification of Andrew Sklar in support of the motion (the "Sklar Certification"), and for related relief (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, the undersigned shall rely on the accompanying Memorandum of Law and Sklar Certification, which set forth the relevant factual and legal bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall be filed with the Court and served upon the undersigned no later than seven (7) days prior to the hearing date hereupon. Unless objections are timely filed and served, the relief requested in the Motion may be granted without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests oral argument on the return date of the Motion if objections are timely filed.

Dated: May 14, 2024

Respectfully submitted,

SKLAR LAW, LLC  
*Attorneys for Andrew Sklar, Chapter 7 Trustee*

By: /s/Andrew Sklar  
Andrew Sklar, Esquire